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COUNSEL FOR THE DEBTOR IN POSSESSION

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	Chapter 11
	§	
1300 CAMPBELL, L.P.,	§	Case No. 09-36300-SGJ-11
	§	
Debtor.	§	Hearings Set: December 4, 2009 at 9:30 a.m.

**WITNESS AND EXHIBIT LIST FOR USE AT HEARINGS ON (1) MOTION FOR
AUTHORITY TO ENTER INTO FIRST AMENDMENT TO COMMERCIAL LEASE
AGREEMENT PURSUANT TO 11 U.S.C. § 363, (2) MOTION FOR APPROVAL OF
DEBTOR IN POSSESSION FINANCING PURSUANT TO 11 U.S.C. § 364(d), (3)
SECOND MOTION FOR AUTHORITY TO USE CASH COLLATERAL AND (4)
MOTION OF GE COMMERCIAL FINANCE BUSINESS PROPERTY CORPORATION
FOR RELIEF FROM STAY PURSUANT TO 11 U.S.C. § 362 (d)(1) and (2)**

TO THE HONORABLE STACEY G. C. JERNIGAN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, 1300 Campbell, L.P. ("Movant"), and files this Witness and Exhibit List for use at the hearings on (1) Motion for Authority to Enter into First Amendment to Commercial Lease Agreement Pursuant to 11 U.S.C. § 363, (2) Motion for Approval of Debtor in Possession Financing Pursuant to 11 U.S.C. § 364(d), (3) Second Motion for Authority to Use Cash Collateral and (4) Motion of GE Commercial Finance Business Property Corporation for Relief from Stay Pursuant to 11 U.S.C. § 362 (d)(1) and (2) and would respectfully show unto the Court as follows:

WITNESSES

Movant may call the following witnesses to testify at the hearings:

1. Steffen E. Waltz
2. Patrick Calvano
3. Joe W. Milkes
4. Sharon Friedburg
5. Allyn Needham

All witnesses designated or called by any other party.

Movant reserves the right to call additional witnesses as may be deemed necessary and appropriate at the hearings.

EXHIBITS

Movant may introduce or request judicial notice of the following exhibits at the hearings:

1. Commercial Lease Agreement dated July 14, 1998
2. Letter of Intent dated August 24, 2009
3. First Amendment to Commercial Lease Agreement
4. Gaty Family, Inc. Loan Commitment dated October 14, 2009
5. Gaty Family, Inc. Loan Commitment dated November 23, 2009
6. Bank of Montreal Letter
7. Monthly Operating Report for October, 2009.
8. Cash Flow Projections - December 2009 through May 2010

9. Insurance Certificate
10. Milkes Realty Valuation report dated September 28, 2009
11. Commission Agreement between 1300 Campbell, L.P. and Universal Shelter Corporation dated September 24, 2009
12. Standard Commission Agreement between Dominion Realty Advisors, Inc. As Agent for Jones Lang LaSalle - Brokerage, Inc. and 1300 Campbell, L.P. dated September 24, 2009
13. Master Commercial Management Agreement between 1300 Campbell, L.P. and Dominion Realty Advisors, Inc. dated August 14, 1999
14. Ad Valorem Property Tax Statements
15. Sharon Friedburg Resume
16. Allyn B. Needham, CEA Resume

All exhibits designated or offered by any other party.

All schedules, pleadings, proofs of claim and matters of record as reflected on the case docket sheet and claims register in this proceeding.

Movant reserves the right to introduce additional exhibits as may be necessary and appropriate at the hearings.

Dated this the 1st day of December, 2009.

Respectfully submitted,

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By: /s/ Joseph F. Postnikoff

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COUNSEL FOR DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of December, 2009, a copy of the foregoing Witness & Exhibit List was served via ECF on the parties registered with the Court to receive ECF and on the following in the manner indicated:

United States Trustee
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/s/ Joseph F. Postnikoff

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